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25 *Additional Counsel Listed on Signature Page*

26 Attorneys for Defendant  
27 DISH Network Corporation, et al.

28 IN THE UNITED STATES DISTRICT COURT  
1 CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION

ENTROPIC COMMUNICATIONS,  
LLC,

Plaintiff,

v.

DISH NETWORK CORPORATION;  
DISH NETWORK LLC; DISH  
NETWORK SERVICE, LLC; AND  
DISH NETWORK CALIFORNIA  
SERVICE CORPORATION,

Lead Case No. 2:23-cv-1043-JWH-KES

**JOINT STIPULATION TO EXTEND  
ENTROPIC COMMUNICATIONS,  
LLC'S DEADLINE TO RESPOND TO  
COUNTERCLAIMS; [PROPOSED]  
ORDER**

District Judge: Hon. John W. Holcomb  
Magistrate Judge: Hon. Karen E. Scott

JOINT STIPULATION TO EXTEND DEADLINE TO RESPOND TO  
COUNTERCLAIMS  
Case No. 2:23-cv-1043-JWH-KES

1 Defendants.  
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9 DISH NETWORK CALIFORNIA  
10 SERVICE CORPORATION,

11 Counter-Claimant,  
12 v.

13 ENTROPIC COMMUNICATIONS,  
14 LLC; MAXLINEAR, INC.; AND  
MAXLINEAR COMMUNICATIONS  
LLC,

15 Counter-Defendants.  
16

1 Plaintiff Entropic Communications, LLC (“Entropic”) and Defendants DISH  
2 Network Corporation; DISH Network L.L.C.; Dish Network Service L.L.C.; and Dish  
3 Network California Service Corporation (collectively, “Defendants”) (collectively  
4 with Entropic, the “Parties”), by and through their respective counsel, enter into this  
5 Joint Stipulation to Extend Entropic’s Deadline to Respond to Counterclaims, as  
6 follows:

7 **WHEREAS**, on February 10, 2023, Entropic filed its Complaint against DISH  
8 Network Corporation; DISH Network LLC; Dish Network Service LLC; and Dish  
9 Network California Service Corporation (Dkt. No. 1) and served the same on  
10 Defendants (Dkt. Nos. 14-17);

11 **WHEREAS**, DISH Network Corporation; DISH Network L.L.C.; Dish  
12 Network Service L.L.C. (“the Dish Colorado Defendants”) moved this Court to  
13 dismiss Entropic’s claims against them for improper venue (Dkt. No. 49) on May 8,  
14 2023, and the same remains fully briefed and under submission before this Court (Dkt.  
15 No. 98 (Opposition), Dkt. 116 (Reply), Dkt. No. 136 (Order vacating hearing));

16 **WHEREAS**, Dish Network California Service Corporation (“Dish  
17 California”) filed its Answer to the Complaint and Counterclaims on September 21,  
18 2023 (Dkt. No. 111) and served the same on Entropic (Dkt. No. 117). In view of the  
19 pending motion to dismiss, the DISH Colorado Defendants have not answered  
20 Entropic’s complaint;

21 **WHEREAS**, Entropic’s current deadline to respond to Dish California’s  
22 Counterclaims is December 22, 2023;

23 **WHEREAS** Entropic has raised certain issues concerning Dish California’s  
24 counterclaims, which Dish California is evaluating;

25 **WHEREAS**, recognizing that it would be most efficient for the Court to  
26 consider any motions concerning the Counterclaims until after the Dish Colorado  
27 Defendants’ venue motion is decided so that, *inter alia*, any amendments to Dish

1 California's counterclaims are also incorporated into any proposed counterclaims by  
2 the Dish Colorado Defendants, Dish California proposed extending the time for  
3 Entropic to respond to the Counterclaims until after this Court decides the Dish  
4 Colorado Defendants' venue motion;

5 **WHEREAS**, Entropic's counsel has agreed to the proposed extension provided  
6 that certain representations and agreements are made in this Stipulation, including that  
7 Dish California agrees that it will not seek discovery concerning the Counterclaims  
8 from Entropic until Dish California amends its Counterclaims or until Entropic  
9 responds to the Counterclaims, whichever is earlier;

10 **WHEREAS**, the parties have further agreed that if the Court denies the DISH  
11 Colorado Defendants' venue motion, the DISH Colorado Defendants shall file an  
12 Answer and/or Counterclaims against Entropic within 21 days of the order denying  
13 the DISH Colorado Defendants' venue motion. Any amendment by Dish California  
14 to its Counterclaims against Entropic shall be filed no later than the date on which the  
15 DISH Colorado Defendants file an Answer and/or Counterclaims against Entropic;

16 **WHEREAS**, the parties have agreed that Dish California shall not seek  
17 discovery from Entropic regarding Dish California's Counterclaims until Dish  
18 California amends its Counterclaims against Entropic or Entropic responds to the  
19 Counterclaims against it, whichever is earlier;

20 **WHEREAS**, given that this is a consolidated action, to be clear—nothing  
21 contained in this Stipulation shall impact the rights or obligations of any non-  
22 signatory;

23 **WHEREAS**, the Parties have agreed to extend Entropic's deadline to respond  
24 to the Counterclaims, or any amendments thereto, to 21 days after either: (i) an order  
25 from this Court granting the Dish Colorado Defendants' venue motion, or (ii) the Dish  
26 Colorado Defendants file an Answer and/or Counterclaims against Entropic,  
27 whichever is later.

**WHEREAS**, if the Court does not issue an Order pursuant to this stipulation because there is no date certain for Defendants' response, the Parties agree to an extension of time for Entropic to respond to the DISH California's Counterclaims (Dkt. No. 111) from December 22, 2023 to January 23, 2024 and agree to enter into subsequent stipulations to further extend Entropic's deadline to respond until after the Court issues an order on the DISH Colorado Defendants' venue motion.

**NOW THEREFORE**, the Parties, by and through their respective counsel, hereby **STIPULATE AND AGREE** as follows:

1. The Parties respectfully request an order from the Court that, if the Court denies the DISH Colorado Defendants' venue motion, the DISH Colorado Defendants shall file an Answer and/or Counterclaims against Entropic within 21 days of the order denying the DISH Colorado Defendants' venue motion. Any amendment by Dish California to its Counterclaims against Entropic shall be filed no later than the date on which the DISH Colorado Defendants file an Answer and/or Counterclaims against Entropic.
2. The Parties respectfully request an order from the Court extending Entropic's deadline to respond to Dish California's Counterclaims, or any amendments thereto, against Entropic from December 22, 2023 until 21 days after either: (i) an order from this Court granting the Dish Colorado Defendants' venue motion, or (ii) the Dish Colorado Defendants file an Answer and/or Counterclaims against Entropic, whichever is later. Notwithstanding the foregoing, Entropic may file a response to any counterclaims filed by any DISH defendant earlier than the date described above.
3. In the event this Court is not inclined to issue an order pursuant to request numbers one and two above, the Parties respectfully request an Order

1 extending Entropic's deadline to respond to DISH California's  
2 counterclaims (Dkt. No. 111) from December 22, 2023 to January 23, 2024.

3 4. Dish California shall not seek discovery from Entropic regarding Dish  
4 California's Counterclaims until Dish California amends its Counterclaims  
5 against Entropic or Entropic responds to the Counterclaims against it,  
6 whichever is earlier.

7  
8 Dated: December 22, 2023 Respectfully Submitted,

9  
10 By: /s/ Oliver Richards

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16 **ATTORNEYS FOR DEFENDANTS**  
17 **DISH NETWORK CORPORATION,**  
18 **ET AL.**

19  
20 Dated: December 22, 2023

21 By: /s/ Christina N. Goodrich

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**ATTORNEYS FOR PLAINTIFF  
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LLC**

## ECF ATTESTATION

I, Oliver J. Richards, am the ECF User whose identification and password are being used to electronically file this Joint Stipulation. In accordance with Local Rule 5-4.3.4, concurrence in and authorization of the filing of this document has been obtained from the counsel of Plaintiff Entropic Communications, LLC will maintain records to support this concurrence for subsequent production for the Court if so ordered or for inspection upon request by a party.

/s/ Oliver Richards  
Oliver Richards